

**THE COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF  
TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS OF GLOBAL NAPS, INC. TO VERIZON  
MASSACHUSETTS**

D.T.E. 03-29

Pursuant to 220 C.M.R. 1.06(b)(c), Global NAPs, Inc. ("Global") submits to Verizon Massachusetts ("Verizon") the following information requests.

**INSTRUCTIONS**

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Verizon or to any individual or entity sponsoring testimony or retained by Verizon to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as may be available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response that is computer generated, state separately (a) what types of data, files, or tapes are included in the

input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.

8. If a Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If Verizon cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why Verizon cannot answer the Request in full, and state what information or knowledge is in Verizon's possession concerning the unanswered portions.
10. If, in answering any of these Requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide Global with the responsive documents, and or which directs Global to inspect documents at any location is not responsive.
13. If you refuse to respond to any Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Please provide all responses to requests within 10 business days from receipt of request, as established by the Hearing Officer's Ground Rules dated March 25, 2003.

**INFORMATION REQUESTS**

- GN-VZ-1-1      Would Verizon deny a collocation identification badge or access card to a collocater's employee based on *any* felony conviction within the last seven years? If not, please state the factors that Verizon would consider in determining whether to issue a badge and card and the procedure Verizon employs for making such a determination.
- GN-VZ-1-2      Does Verizon deny collocation identification badges or access cards to individuals whose criminal history does *not* include felony convictions? If so, please state the factors that Verizon would consider in determining whether to issue a badge and card and the procedure Verizon employs for making such a determination.
- GN-VZ-1-3      Has Verizon ever suffered a security threat or breach from an employee of a collocater who had a record of felony conviction within the seven years preceding the event? If so, please provide the date of the incident, the nature of the incident and the outcome.
- GN-VZ-1-4      Has Verizon ever denied a collocation access identification badge or access card to a collocater's employee based on a felony conviction? If so, please state:
- a.      The date Verizon issued the denial;
  - b.      The felony conviction which resulted in the denial; and
  - c.      The date of the felony conviction.
- GN-VZ-1-5      Would a collocater applicant whose drug screening revealed the presence of marijuana, cocaine, opiates, phencyclidine or amphetamines in the body be automatically disqualified from receiving a collocation access identification badge or access card?
- GN-VZ-1-6      If the answer to GN-VZ-5 is no, how would Verizon go about determining whether to issue a badge?
- GN-VZ-1-7      If the answer to GN-VZ-5 is yes, would the individual be forever precluded from obtaining a collocation identification badge or access card? If not, how long would the individual have to wait before being eligible to receive a badge or card?
- GN-VZ-1-8      Has Verizon ever suffered a security threat or breach from an employee of a collocater who was under the influence of marijuana, cocaine,

D.T.E. 03-29

opiates, phencyclidine or amphetamines? If so, please state the date of the incident, the nature of the incident and the outcome.

- GN-VZ-1-9 Would an employee of a collocator be denied access to a Verizon facility if he or she was obviously under the influence of an intoxicant?
- GN- VZ-1-10 Referring to DTE-VZ-1-2, Verizon states that it uses the personal information contained in the collocation identification and access card applications to “process” the applications. (a) What does Verizon mean by this? (b) How long does “Processing” an application take?
- GN-VZ-1-11 Specifically, for what purpose does Verizon require social security numbers its applications?
- GN-VZ-1-12 Referring again to DTE-VZ-1-2, Verizon provides an example of how a social security number might be used to resolve a problem with a malfunctioning access card. Could Verizon resolve the problem by assigning each collocator a unique number which is not identified in any way with a social security number?
- GN-VZ-1-13 Could Verizon accomplish its security goals in such a manner as to not require an individual to provide his or her social security number?
- GN-VZ-1-14 Specifically, for what purpose does Verizon require the applicant to provide his or her date and place of birth?
- GN-VZ-1-15 Could Verizon accomplish its security goals without requiring the individual to provide his or her date and place of birth?